

**Via Electronic Mail**

January 26, 2021

Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: Docket No. 5088 - Renewable Energy Growth (RE Growth) Program Year 2021 submitted by the Rhode Island Distributed Generation Board's (DG Board) and the Narragansett Electric Co. d/b/a National Grid**

Dear Ms. Massaro,

The Northeast Clean Energy Council (“NECEC”)<sup>1</sup> appreciates the opportunity to provide further comment to the Rhode Island Public Utilities Commission (“Commission”) in Docket No. 5088 regarding the pre-filed testimony of the Division of Public Utilities and Carriers’ (the “Division”) consultant, Michael Brennan, on the 2021 program year of the Renewable Energy Growth (“RE Growth”) Program. Specifically, NECEC disagrees with the Division’s positions regarding the Solar Carport Adder and the Low-Income Community Remote Distributed Generation (“CRDG”) Adder.

**Solar Carport Adder**

In the testimony of its outside consultant, the Division provides an interpretation of the statutory requirement that public policy adders provide “identifiable” benefit to customers. Specifically, the Division’s consultant “recommends these identifiable benefits should be interpreted to mean the direct quantifiable benefits to ratepayers. The Division’s consultant then concludes a positive benefit to cost ratio (e.g., > 1.0), based predominantly on direct ratepayer benefits should form the basis for recommending such adders.”<sup>2</sup> However, the Renewable Energy Growth statute (Rhode Island General Law § 39-26.6-22) does not specify that benefits must be “direct quantifiable benefits for ratepayers” only that they be “identifiable.” In the RE Growth proposal, National Grid has clearly identified the benefits associated with the Solar Carport Adder. And societal benefits are required to be considered as part of a Docket 4600 analysis.<sup>3</sup> In fact, the Commission has previously discussed how to appropriately consider societal benefits, “This

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<sup>1</sup> NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

<sup>2</sup> Testimony of Michael Brennan, Division of Public Utilities and Carriers, Docket 5088, at 15.

<sup>3</sup> Docket 4600 Benefit-Cost Framework

means not that societal benefits are irrelevant, but rather, that they cannot be the only benefit considered to support the additional cost. Rather, the quantification of societal benefits is useful to more comprehensively support a business case; at its core, the business case has to address how electric ratepayers are causing or benefiting, because of their role as electric ratepayers, from the proposal. Societal benefits can be used to augment a business case to allow the PUC to consider the full range of program benefits.”<sup>4</sup> To dismiss a public policy adder on the basis that its cost-effectiveness includes societal benefits contradicts the Docket 4600 Framework and Commission precedent. This would have implications far beyond the RE Growth Program and could hamper the state’s efforts to satisfy its emissions commitments. NECEC urges the Commission approve the proposed Solar Carport Adder and in so doing, reject the argument that “identifiable” benefits be narrowly interpreted to mean direct and quantifiable benefits to ratepayers, at the expense of societal benefits.

### Low-Income CRDG Adder

Similarly, the Division, through its consultant’s testimony, does not support the inclusion of the Low-Income CRDG adder for 2021.<sup>5</sup> The testimony contains a recommendations that more cost-effective approaches should be explored to encourage the development of CRDG projects that benefit A-60 customers, and that this benefit should be made available to more A-60 customers. NECEC agrees that this adder, in itself, is not sufficient to drive meaningful low-income participation in the program. We also agree that efforts to make the benefits of clean energy available to more A-60 customers are warranted and we stand ready to assist in those efforts to overcome the additional financial and non-financial barriers to low-income participation. That said, an adder is an important near-term tool to overcome the significant financial barriers that often prevent low-income participation in clean energy programs. This adder, coupled with other efforts to drive low-income participation, would drive success. But, without an added incentive for low-income customers, those efforts will bear little fruit. We urge the Commission to approve the Low-Income CRDG Adder for the 2021 program year and to undertake a stakeholder process for identifying program changes that could drive meaningful participation by low-income customers.

We appreciate the opportunity to supplement our initial comments and urge the Commission to adopt a 2021 RE Growth Program that incorporates a continuation of the Solar Carport Adder and an introduction of the Low-Income CRDG Adder.

Sincerely,



Jeremy McDiarmid  
Vice President, Policy & Government Affairs



Sean Burke  
Policy Associate

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<sup>4</sup> Order, Docket 4604, at 5

<sup>5</sup> Brennan Testimony, *supra* note 2, at 22.